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6 Attorneys for Defendant

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 * * *

11
12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 vs.
15 MICHAEL JOHNS,
16 Defendant.

2:12-cr-45-KJD-CWH

**STIPULATION TO CONTINUE
SENTENCING HEARING**

(Third Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden,
18 United States Attorney, and Amber Craig, Assistant United States Attorney, counsel for the United
19 States of America, and Rene L. Valladares, Federal Public Defender, and RAQUEL LAZO, Assistant
20 Federal Public Defender, counsel for Michael Johns, that the sentencing hearing currently scheduled
21 for, August 22, 2012 at the hour of 9:00 a.m., be vacated and set to a date and time convenient to
22 this Court but no earlier than forty-five (45) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Defense counsel will be out of the jurisdiction at a conference on the currently
25 scheduled sentencing date.
- 26 2. Additionally, the parties are meeting and conferring regarding sentencing
27 issues. The parties require additional time to continue to work to resolve these issues.
- 28 3. The defendant is incarcerated and agrees to the continuance in this matter.

1 4. The additional time requested herein is not sought for purposes of delay, but
2 merely to allow sufficient time for the district court case to proceed.

3 5. The additional time requested by this Stipulation is excludable in computing
4 the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
5 United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Section 3161(h)(7)(A),
6 considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and
7 3161(h)(7)(B)(iv).

8 6. This is the third stipulation to continue filed herein.

9 DATED this 13th day of August, 2012.

10 RENE L. VALLADARES
11 Federal Public Defender

DANIEL BOGDEN
United States of Attorney

12 */s/ Raquel Lazo*
13 By: _____
14 RAQUEL LAZO,
Assistant Federal Public Defender

/s/ Amber Craig
By: _____
AMBER CRAIG,
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:12-cr-45-KJD-CWH

Plaintiff,

ORDER

vs.

MICHAEL JOHNS,

Defendant.

IT IS THEREFORE ORDERED, that the sentencing hearing currently scheduled for August 22, 2012 at the hour of 9:00 a.m., be vacated and continued to October 10, 2012, Courtroom 6D.

DATED 14th day of August, 2012.


UNITED STATES DISTRICT JUDGE